

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:)	
)	Bankruptcy No. 24-21629-JAD
Susan Bayne Cagnon)	
)	
)	
Debtor(s))	Chapter 13
Susan Bayne Cagnon)	
)	
)	Related to Claim 8
)	
Movant(s))	
v.)	Document No.
LVNV Funding/Resurgent Capital Services,)	
)	
Respondent(s))	

OBJECTION TO CLAIM

COMES NOW, Susan Bayne Cagnon, by and through her attorneys, David A Rice, Esquire, and Rice & Associates Law Firm, and object to the claim of the Respondent, as follows:

1. Debtor(s), filed a voluntary petition for relief under chapter 13 of Title 11 of the United States Code July 3, 2024.
2. This matter is a core proceeding relative to the debtor's bankruptcy.
3. This Court has jurisdiction over this objection, filed pursuant to 11 USC Section 502.
4. Respondent has filed an unsecured claim in the amount of \$2,625.96.
5. The Respondent's claim states that a judgment was entered on May, 5, 2011. No transactions have taken place since the date of judgment. The judgment has not been revived.

6. The Debtors believe that the Respondent's claim is unenforceable under the Pennsylvania Statute of Limitations at 42 Pa. C.S. 5525(a), which is 4 years from the date of last activity on the account.

7. The Respondent's claim should be denied.

WHEREFORE, the Debtor requests an Order sustaining her Objection to the claim of the Respondent and a finding that the claim is disallowed.

Date: October 2, 2024

/s/ David A Rice
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